



THEODORE S. GREEN
RICHARD D. WILLSTATTER

December 11, 2019

Hon. Vincent L. Briccetti
United States District Court
300 Quarropas Street
White Plains, New York 10601

APPLICATION DENIED:

Defendant Garcia shall remain on home detention. However, the previously-imposed GPS requirement will be removed and replaced with standard Location Monitoring, which is less restrictive than GPS monitoring. Defendant may leave home for attorney visits, court appearances, Pretrial Services appointments, medical and dental appointments, and employment and efforts to seek employment, but only to the extent that any of the foregoing is pre-approved by Pretrial Services.

SO ORDERED:

A handwritten signature of Vincent L. Briccetti in black ink.

12/11/2019

Vincent L. Briccetti, U.S.D.J.

Date

re: *United States v. Mark Garcia*. 19-cr-685 (VB)

Dear Judge Briccetti:

This letter is an application to modify the bail conditions for Mark Garcia by either lifting the electronic monitoring conditions or changing the condition to electronic monitoring without home confinement, or alternatively that the matter be addressed at a conference. In addition, we ask that Mr. Garcia be permitted to seek and maintain employment, subject to his advising the pretrial services office in advance of prospective jobs or job interviews, work schedules, work-related travel, and the like. Mr. Garcia's residence was recently changed to Bronx, New York, after he was discharged from the Air Force, where he had been stationed in Kansas. As Mr. Garcia is no longer employed by the Air Force, he is now seeking other work.

Soon after the Court initially set bail conditions, electronic monitoring was added as a condition (without objection) at the request of the pretrial services office, in order to enforce the requirement that Mr. Garcia be confined to McConnell Air Force Base. In light of Mr. Garcia's relocation to New York and his current residence in his father's home, we respectfully ask that the electronic monitoring conditions be revisited. As of now, Mr. Garcia has been directed by the pretrial services office to submit to home confinement at the Bronx residence pending any further adjustments of the monitoring conditions by the Court.

I have advised AUSA James Ligtenberg and Pre-Trial Services Officer Vincent Adams of this application but have not obtained their consent to the modifications requested.

Very truly yours,
/s/ Theodore S. Green
Theodore S. Green

cc: AUSA James Ligtenberg
Vincent Adams, Pretrial Services Officer, White Plains